

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KATIE MILLIO, IRENE JOHNSON,
JANINE HELLER and TOMAYITA
STEVENSON,

Plaintiffs,

vs.

WHITMAN EDUCATION GROUP,
INC., CAREER EDUCATION
CORPORATION, ULTRASOUND
DIAGNOSTIC SCHOOL and LOUIS
GIANELLI,

Defendants.

CASE NUMBER: 04-30130-MAP

**ASSENTED-TO MOTION BY DEFENDANTS WHITMAN EDUCATION
GROUP, INC., CAREER EDUCATION CORPORATION, and
ULTRASOUND DIAGNOSTIC SCHOOL FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL**

Defendants Whitman Education Group, Inc., Career Education Corporation and
Ultrasound Diagnostic School (hereinafter "Defendants"), with the assent of the Plaintiffs,
hereby respectfully request that the Court grant a two (2) week extension of time for Defendants
to respond to Plaintiffs' Motion to Compel Discovery Against Ultrasound Diagnostic School,
Whitman Education Group, Inc., and Career Education Corporation ("Motion") [dkt #41]. In
support thereof, Defendants aver:

1. On October 20, 2005, Plaintiffs filed the Motion. Thus, pursuant to Local Rule 7.1(b)(2), Defendants' opposition would be due November 3, 2005.

2. The Motion is seventeen (17) pages long, and takes issue with Defendants' Objections and Responses to Interrogatory Nos. 1, 2, 11, 13, 19, 20, and 24, Defendants' Objections and Responses to Document Request Nos. 24, 25, 26, 27, 28, 29, 30, 36, 37, 42, and Defendants' alleged failure to produce electronic discovery.

3. Defendants' counsel diligently has been preparing an Opposition in response to the Motion, which has required extensive legal research as to the appropriate scope of discovery, but was unable to complete the Opposition prior to preexisting out-of-town travel plans that precede and overlap with the current due date for the Opposition.

4. Defendants are requesting an additional two weeks to file their Opposition to the Motion to allow counsel sufficient time after returning from out of town to complete the Opposition, which will provide additional information and legal authority to assist the Court in deciding the Motion.

5. Defendants' counsel has discussed this request with Plaintiffs' counsel, who has no objection to this motion or the extension of time to respond until November 17, 2005.

WHEREFORE, Defendants hereby seek an extension of time until **November 17, 2005** to file their Opposition to Plaintiffs' Motion to Compel.

Dated: November 1, 2005.

The Defendants,
WHITMAN EDUCATION GROUP, INC.,
CAREER EDUCATION CORPORATION,
ULTRASOUND DIAGNOSTIC SCHOOL,
By Their Attorneys:

/s/ Jeffrey E. Poindexter

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**ORDER GRANTING EXTENSION OF TIME FOR DEFENDANTS
WHITMAN EDUCATION GROUP, INC., CAREER EDUCATION
CORPORATION, and ULTRASOUND DIAGNOSTIC SCHOOL
TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL**

AND NOW this ____ day of _____, 2001, IT IS HEREBY

ORDERED that the UNOPPOSED MOTION BY DEFENDANTS WHITMAN EDUCATION GROUP, INC., CAREER EDUCATION CORPORATION, and ULTRASOUND DIAGNOSTIC SCHOOL FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL is **GRANTED** and Defendants Whitman Education Group, Inc., Career Education Corporation, and Ultrasound Diagnostic School shall have until **November 17, 2005**, to respond to Plaintiffs' Motion to Compel Discovery.

(Neiman, J.)